

# CONNELL FOLEY LLP

## ATTORNEYS AT LAW

JOHN A. FINDAR (1969)  
 GEORGE W. CONNELL (2005)  
 ADRIAN M. FOLEY, JR.  
 GEORGE J. KENNY\*  
 KENNETH F. KUNZMAN  
 SAMUEL D. LORD  
 RICHARD D. CATENACCI  
 RICHARD J. BADOLATO\*  
 PETER D. MANAHAN  
 JOHN B. MURRAY  
 MARK L. FLEDER  
 KEVIN J. COAKLEY  
 THOMAS S. COSMA  
 KATHLEEN S. MURPHY  
 PATRICK J. MCAULEY  
 PETER J. FLIZZI\*  
 KEVIN L. GARDNER  
 ROBERT E. RYAN  
 MICHAEL X. MCBRIDE\*  
 JEFFREY W. MCGYAN\*  
 EDWARD S. WARDELL  
 PETER J. SMITH\*  
 WILLIAM P. KLAUSS  
 BRIAN G. STELLER  
 PHILIP F. MCGOVERN, JR.  
 KAREN PAINTER RANDALL  
 LIZA M. WALSH  
 JOHN P. LACEY  
 MICHAEL J. CROWLEY\*  
 TIMOTHY E. CORRISTON\*

PATRICK J. HUGHES\*  
 JAMES C. MCCANN\*  
 JOHN D. CROMIE  
 ANGELA A. IUSO\*  
 WILLIAM T. McGLOIN\*  
 BRENDAN JUDGE  
 STEPHEN A. URBAN  
 CHARLES J. HARRINGTON III  
 STEPHEN V. PALANGA\*  
 TRICIA O'REILLY\*  
 ANTHONY F. VITIELLO\*  
 MARC D. HARFNER  
 JONATHAN P. MCHENRY  
 BLAD D. SHALIT\*  
 M. TREVOR LYONS\*  
 CRAIG S. DEMARESKI\*  
 W. NEVINS MCCANN\*  
 THOMAS J. O'LEARY\*  
 MITCHELL W. TARACCHI  
 MICHAEL A. SHADICK  
 OWEN C. McCARTHY\*  
 PATRICIA A. LEE\*  
 AGNIESZKA ANTONIAN\*  
 CHRISTOPHER J. TUCCI\*  
 NEIL V. MOODY\*  
 STEVE BARNETT\*  
 THOMAS M. SCUDERI\*  
 JOSEPH M. MURPHY\*  
 NANCY A. SKIDMORE\*  
 CHRISTINE S. ORLANDO

85 LIVINGSTON AVENUE  
 ROSELAND, NJ 07068-3702  
 (973) 535-0500  
 FAX: (973) 535-9217

## OTHER OFFICES

HARBORSIDE FINANCIAL CENTER  
 2510 PLAZA FIVE  
 JERSEY CITY, NJ 07311  
 (201) 521-1000  
 FAX: (201) 521-0100

1500 MARKET STREET  
 12TH FLOOR,  
 EAST TOWER  
 PHILADELPHIA, PA 19102  
 (215) 246-3409  
 FAX: (215) 665-5727

THE ATIJUM, SUITE E  
 309 MORRIS AVENUE  
 SPRING LAKE, NJ 07762  
 (732) 449-1440  
 FAX: (732) 449-0934

888 SEVENTH AVENUE  
 9TH FLOOR  
 NEW YORK, NY 10166  
 (212) 307-3700  
 FAX: (212) 262-0050

LIBERTY VIEW  
 457 HADDONFIELD ROAD, SUITE 230  
 CHERRY HILL, NJ 08002  
 (856) 417-7100  
 FAX: (856) 317-7117

JOHN W. BISSELL  
 EUGENE J. CODEY, JR.  
 FRANCIS J. ORLANDO  
 FRANCIS E. SCHILLER\*  
 EUGENE P. SQUEO\*  
 BRIAN P. MORRISSEY\*  
 NOEL D. HUMPHREYS\*  
 ANTHONY ROMANO II\*

KARIN L. SPALDING\*  
 JODI ANNE HUDSON\*  
 RICHARD A. JAGEN  
 JASON E. MARK\*  
 JENNA A. CONRAD\*  
 ALEXIS E. LAZZARA  
 SHANNON L. KEMP  
 DANIEL B. KESSLER\*

JASON D. FALK\*  
 MICHAEL J. SHORT+  
 VICTORIA N. MANOUSHAGIAN\*  
 PATRICK J. MURPHY, III\*  
 MEGHAN K. MUSCO\*  
 BRENDAN W. CARROLL\*  
 EDMUND J. CAULFIELD\*  
 SYDNEY J. DARLING\*  
 JESSICA L. PALMER\*  
 NEIL V. SHAR\*  
 STEPHEN H. TURANO\*  
 STEVEN A. KROLL\*  
 ROBERT M. DIPISA\*  
 MATTHEW A. BAKER+  
 MICHAEL J. CREGAN\*  
 THOMAS M. BLEWITT, JR.+  
 BRIAN S. WOLFSON  
 SONYA B. COLE\*  
 MARY E. HURLEY  
 DANIELLE M. NOVAK+  
 JAMES E. FIGLIozzi\*  
 MATTHEW D. FIELDING  
 MELISSA L. HIRSCH+  
 MARIE L. BELANGER  
 NICHOLAS W. URQUHOU

\* ALSO ADMITTED IN NEW YORK  
 + ALSO ADMITTED IN PENNSYLVANIA  
 # ONLY ADMITTED IN NEW YORK  
 PLEASE REPLY TO ROSELAND, NJ

September 26, 2012

R 16  
 1-16-12

## VIA ECF AND FAX

Hon. Madeline Cox Arleo, U.S.M.J.  
 King Building & U.S. Courthouse  
 50 Walnut St., P.O. Box 999  
 Newark, NJ 07101-0999

**Re: Montvale Surgical Center a/s/o Thomas S. v. Aetna Ins. Co. et al.,**  
**Civ. No. 12-2874 (SDW/MCA)**

Dear Judge Arleo:

This firm represents Aetna Health Inc. (improperly pled as "Aetna Insurance Company") (hereinafter "Aetna") in the above-referenced matter. On July 16, 2012, Your Honor entered an Order in this case that established summary judgment filing deadlines, with cross-motions to be filed by October 15, 2012; any opposition by November 15, 2012; and any reply by December 7, 2012. (Doc. No. 5).

With the consent of Plaintiff Montvale Surgical Center, Aetna respectfully requests a 90-day adjournment of the foregoing filing deadlines related to the parties' anticipated cross-motions for summary judgment. This 90-day consent adjournment is requested in view of this firm's entry into this case in August, 2012, and overlapping deadlines we have in other matters. We are seeking 90 days so that the deadlines fall beyond the forthcoming holiday season. The requested new dates sought with consent are: January 15, 2013 for cross-motions to be filed; February 15, 2013 for any opposition to be filed; and March 8, 2013 for the filing of reply.

Hon. Madeline Cox Arleo, U.S.M.J.  
September 26, 2012  
Page 2

As always, we are available to answer any questions Your Honor or Your Honor's staff may have on this matter. If this request meets with Your Honor's approval, for convenience, a "So Ordered" signature line is included *infra*.

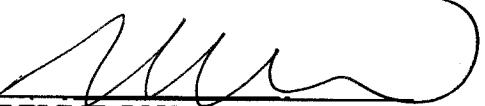
Respectfully submitted,

s/ Patrick J. Murphy, III

Patrick J. Murphy, III

Cc: Andrew Bronsnick, Esq. (Via CM/ECF and Email)

IT IS SO ORDERED this 26 of September, 2012, that cross-motions for summary judgment shall be filed by January 15, 2013; opposition by February 15, 2013; and reply brief by March 8, 2013.

  
HON. MADELINE COX ARLEO, U.S.M.J.